

In re Patent Application of  
**DELLMO ET AL.**  
Serial No. 10/806,937  
Filed: MARCH 23, 2004

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**REMARKS**

Applicants thank the Examiner for the careful and thorough examination of the present application. Independent Claim 12 has been amended to correct a minor informality. The patentability of the claims is discussed below.

**I. The Claimed Invention**

The invention, as recited in independent Claim 1, for example, is directed to a cryptographic device comprising a cryptographic module and a communications module coupled thereto. The cryptographic module includes a user network interface and a cryptographic processor coupled thereto. The communications module includes a network communications interface coupled to the cryptographic processor, and the cryptographic processor communicates with the user network interface using a predetermined protocol. The cryptographic processor communicates with the network communications interface using the predetermined protocol. The user network interface includes a plurality of different connectors for coupling the cryptographic module to different network devices.

Independent Claim 37 is directed to the cryptographic module of independent Claim 1. Independent Claim 21 is a method counterpart of independent Claim 1. Independent Claim 28 is a system counterpart of independent Claim 1.

Independent Claim 12 is directed to a corresponding cryptographic device where the cryptographic module includes a

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Local Area Network (LAN) interface, the communications module includes a network LAN interface, the cryptographic processor communicates using a Media Independent Interface (MII), and the cryptographic module and communications module both operate using at least one unique external media access control (MAC) address, and at least one fixed internal MAC address.

## **II. The Claims Are Patentable**

### **A. Independent Claims 1-11, and 21-42 Are Patentable**

The Examiner rejected independent Claims 1, 21, 28, and 37 based on a combination of Dellmo et al. and Dichter. Dellmo et al. is directed to a secure wireless LAN device including a housing, a wireless transceiver carried by the housing, and a cryptography circuit carried by the housing. A media access controller (MAC) is included and implements a predetermined wireless LAN MAC protocol. The cryptography circuit includes a cryptography processor, and a control gateway circuit connected to the MAC and the wireless transceiver. The secure wireless LAN device also includes a user network interface carried by the housing and connected to the MAC.

The Examiner correctly recognized that Dellmo et al. fails to disclose the user network interface including a plurality of different connectors for coupling the cryptographic module to different network devices. The Examiner then turned to Dichter for this critical deficiency.

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Dichter is directed to a computer network including a plurality of nodes. A programmable switching network allows the nodes to be connected in a plurality of different ways, for example, to selectively allow a node to be connected either as a pass through node or a non-pass through node, and to connect nodes to one another via telephone lines.

Applicants respectfully submit that Dichter fails to disclose the user network interface including a plurality of different connectors for coupling the cryptographic module to different network devices. The Examiner contends that a network hub, as disclosed in the background of Dichter, supplies the critical deficiency of Dellmo et al. As disclosed in the background of Dichter, a network hub includes "a plurality of cable connectors so that each computer on the network may be connected to the hub." (See Dichter, Col. 1, lines 32-34). The network hub, as disclosed in Dichter, fails to disclose or suggest that the connectors are different. In fact, Dichter discloses that the connectors of the hub are all the same, that is, they are all RJ-45 connectors. (See Dichter, Col. 1, lines 49-53). Accordingly, the Examiner's combination of references fails to disclose the claimed invention.

Additionally, Applicants respectfully submit that the Examiner's combination of Dellmo et al. and Dichter is improper. Applicants point out that Dellmo et al., whose primary objective is to provide greater security in a wireless LAN environment, teaches a secure wireless LAN device including a housing, a

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wireless transceiver carried by the housing, and a cryptography circuit carried by the housing. Conversely, Dichter discloses a configurable network that provides an efficient and specification compliant topology without requiring the rewiring of a building. A person having ordinary skill in the art would not turn to the programmably configurable computer network of Dichter to combine with the cryptographic device of Dellmo et al.

Still further, Dichter is directed to a wired computer network. As noted above, the wired configurable network of Dichter advantageously allows the use of existing wiring in a building, mainly existing telephone lines. In stark contrast, Dellmo et al. discloses a secure wireless network device. A person having ordinary skill in the art would not combine the wired network of Dichter with the secure wireless network device of Dellmo et al. as not only does Dichter teach away from Dellmo et al, but combining the wired network of Dichter with the secure wireless device of Dellmo et al. would destroy the operability of the Dellmo et al. secure wireless device. Accordingly, the Examiner's combination of references is improper.

Accordingly, Applicants submit that independent Claims 1, 21, 28, and 37 are patentable over the prior art. It is submitted that its dependent claims, which recite yet further distinguishing features are also patentable over the cited references for at least the reasons set forth above.

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Accordingly, these dependent claims require no further discussion herein.

B. Claims 12-20 Are Patentable

The Examiner rejected independent Claim 12 over a four-way combination of Dellmo et al., Boucher et al., Nguyen, and Dichter. The Examiner cited Dellmo et al. as teaching a cryptographic device comprising a cryptographic module and a communications module coupled thereto. The cryptographic module includes a user LAN interface and a cryptographic processor.

The Examiner correctly recognized that Dellmo et al. does not teach a cryptographic processor communicating with the user network interface using a Media Independent Interface (MII). The Examiner then turned to Boucher et al. for this noted deficiency. The Examiner contended Boucher et al. discloses the cryptographic processor communicating with the user network interface using an MII, and the cryptographic processor communicating with the network LAN interface using the MII. Boucher et al. is directed to a device for processing network communication to greatly increase the speed and efficiency of transferred data. Boucher et al. discloses an intelligent network interface card connected with four network lines that transport data along a number of different conduits, where each connection provides an MII.

The Examiner further correctly recognized that even a selective combination of Dellmo et al. and Boucher et al. fails

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to teach the cryptographic processor communicating with the network LAN interface using the MII and cryptographic module both operating using at least one unique external media access control (MAC) address, and at least one fixed internal address. The Examiner turned to Nguyen et al. for this deficiency. Nguyen et al. is directed to a method and apparatus for improving the configuration of virtual connections. Virtual path identifier and virtual channel identifier availability indexes are made available to network administrators in order to reduce the potential for misconfiguration.

The Examiner still further correctly recognized that even the three-way combination of Dellmo et al., Boucher et al. and Nguyen fails to disclose the user LAN interface including a plurality of different connectors for coupling the cryptographic module to different network devices. The Examiner then turned to Dichter for this critical deficiency.

Dichter is directed to a computer network including a plurality of nodes. A programmable switching network allows the nodes to be connected in a plurality of different ways, for example, to selectively allow a node to be connected either as a pass through node or a non-pass through node, and to connect nodes to one another via telephone lines.

Applicants respectfully submit that the Examiner's proposed combination of Dellmo et al., Bouchard et al., Nguyen et al., and Dichter is improper. Applicants point out that Dellmo et al., as noted above, and whose primary objective is to

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provide greater security in a wireless LAN environment, teaches a secure wireless LAN device including a housing, a wireless transceiver carried by the housing, and a cryptography circuit carried by the housing. Conversely, Bouchard et al. and Nguyen et al. disclose attempts at efficient network communication and virtual connection configuration in a non-secure environment.

Still further, Dichter, whose combination with Dellmo et al. is improper for the reasons stated above, is directed to a wired configurable network that provides an efficient and specification compliant topology without the rewiring of a building. A person having ordinary skill in the art would not further turn to the virtual connection configuration settings of both Bouchard et al. and Nguyen to supply the deficiencies of Dellmo et al. and Dichter.

Applicants submit that the Examiner is using impermissible hindsight reconstruction based on Applicants' specification in an attempt to produce claimed invention by selectively assembling disjoint pieces of the prior art. Indeed, a person having ordinary skill in the art would be taught away from the combining the increased network efficiency and the improved virtual connection configuration of Bouchard et al. and Nguyen et al. with the secure wireless LAN device of Dellmo et al, and further with the wired configurable network that provides an efficient and specification compliant topology of Dichter.

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Accordingly, Applicants submit that independent Claim 12 is patentable over the prior art. It is submitted that its dependent claims, which recite yet further distinguishing features, are also patentable over the cited references for at least the reasons set forth above. Accordingly, these dependent claims require no further discussion herein.



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### III. Conclusions

In view of the arguments presented above, it is submitted that all of the claims are patentable. Accordingly, a Notice of Allowance is therefore respectfully requested in due course. If the Examiner determines any remaining informalities exist, he is encouraged to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,



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